

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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ALTAUNE BROWN,

**MOTION FOR DEFAULT
JUDGMENT**

Plaintiff,

-against-

Civil Action No.:
1:19-cv-07158-LJL

GOOD FRIENDSHIP DELI & TOBACCO AND
3650 WHITE PLAINS CORP.,

Defendants.

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PLEASE TAKE NOTICE, Plaintiff moves this court for a judgment by default in this action, and shows that the complaint in the above case was filed in this court on July 31, 2019; the summons and complaint were duly served on the Defendants Good Friendship Deli & Tobacco and 3650 White Plains Corp. through the secretary of state on September 5, 2019; no answer or other defense has been filed by the Defendant Good Friendship Deli & Tobacco; counsel for Defendant 3650 White Plains Corp withdrew on March 12, 2020; On March 12, 2020, Defendants Good Friendship Deli & Tobacco and 3650 White Plains Corp. were put on notice that they had until April 12, 2020 to retain an attorney or the Court would entertain a motion for Default; Defendants Good Friendship Deli & Tobacco and 3650 White Plains Corp. are not in military service and are not an infant or incompetent as appears in the affirmation of Bradly G. Marks submitted herewith.

WHEREFORE, Plaintiff moves that this Court enter a judgment as follows:

1. That Defendants Good Friendship Deli & Tobacco and 3650 White Plains Corp. take all steps necessary to make their premises compliant with the Americans with Disabilities Act, New York State Human Rights Laws, and New York City Human Rights Laws.
2. That the Plaintiff be awarded one thousand dollars (\$1,000) in compensatory damages based on the Defendants' violation of the New York City Human Rights Law and the New York State Human Rights Law.
3. That the Defendants Good Friendship Deli & Tobacco and 3650 White Plains Corp. comply with terms of the Final Judgment within sixty (60) days of the entry of the judgment.
4. That this Honorable Court retain jurisdiction relating to the Plaintiff's attorneys' fees costs and said motion for the same shall be filed within ninety (90) days of entry of this Final Judgment.
5. For such other and further relief as the Court may deem just and proper.

Dated: New York, New York
April 22, 2021

THE MARKS LAW FIRM

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